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March 9, 2007

**VIA FAX and REGULAR MAIL**

William D. Frumkin, Esq.  
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399 Knollwood Road, Suite 310  
White Plains, New York 10603

**Re: Watson Services, Inc. & Teamsters Local 445  
Freight Division Pension Fund; Local 445, IBT  
(Funds' Assessment of Late Charges;  
Employer's Request for Information)**

Dear William:

I am in receipt of your letter dated March 8, 2007. I appreciate your invitation to address the Trustees at today's meeting, but unfortunately, I am unable to attend. I believe, as you note in your letter, our position has been spelled out in sufficient detail (in our letters dated January 23, 2007, November 20, 2006, and September 18, 2006) for the Trustees' consideration.

Mr. Watson advises me that WSI has continued to make its payments to the Funds timely – and, at times, even early. He has every intention of continuing to meet that commitment in the future.

I appreciate your explanation of the Union's position with regard to the Employer's information requests, and am taking it under consideration. As always, if you have any questions, or wish to discuss, please do not hesitate to write or call.

Very truly yours,

**KREITZMAN MORTENSEN & BORDEN**



Seth H. Borden

cc: Mr. Frederick Watson